



May 1, 2020

Attn: Racheal Jones
Supplemental Draft EIS, Willow Master Development Plan Comments
222 West 7th Avenue, Mailstop #13
Anchorage, Alaska 99513

Re: ASRC Request of Extension on the Supplemental Draft EIS for the Willow Master Development Plan Comment Period.

Submitted via email to: rajones@blm.gov

Dear Ms. Jones:

Arctic Slope Regional Corporation (ASRC) would like to request an extension to the Supplemental Draft EIS for the Willow Master Development Plan comment period. **We request that the comment period be extended by 30 days.**

ASRC applauds BLM in their effort to provide new ways of commenting on the Willow Master Plan during the COVID-19 crisis. While these new options provide wider access to commenters in-lieu of face to face meetings, we feel that it presents some challenges to stakeholders in the communities of the North Slope. The virtual public meetings closest to the proposed development have been negatively affected by poor connectivity, technical glitches and public health distancing. The lack of things as simple as large format printed maps for stakeholders to review and discuss makes understanding the overall project and alternatives more difficult.

These types of challenges are even more magnified when village elders are trying to process information in new formats. We feel strongly that these critical elder voices have not had the opportunity to be properly heard.

We are aware of requests from the Native Village of Nuiqsut and Kuukpik Corporation requesting an extension of the public comment period. As both these entities are from Nuiqsut - the most impacted community - we respect and support their desire for an extension under the current COVID-19 situation.

Another missed opportunity for valuable local North Slope input is from the NPRA Working Group. This group has not had a functional meeting during the current public comment period. The NPRA Working Group is an important vehicle for BLM to be informed on the local concerns on NPRA and BLM's management of the NPRA. Decisions being made about our region should be centered on

the people whom live and subsist here. The NPRA Working Group is a good forum for BLM to collaborate meaningfully with the local people and for the local people to contribute to management of the NPRA. The NPRA Working Group has not been utilized for providing local input on the Supplemental Draft EIS for the Willow Development Master Plan.

The Willow project represents the kind of development that ASRC supports; it represents a durable addition to the North Slope economy. The predicted uplift to North Slope production will also be good for the TAPS operations.

However, the concerns raised argue for a moderate extension to the public comment period. We feel allowing 30-day extension beyond the current May 4, 2020 deadline would provide an opportunity to address these issues.

Thank you for your consideration of our request.

Sincerely,



Erik Kenning
Director of Land Management & Enforcement

CC: Chad Padgett, State Director, BLM Alaska